



February 29, 2008  
*Via ECFS Transmission*

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Marlene H. Dortch, Commission Secretary  
Office of the Secretary  
Federal Communications Commission  
445 – 12<sup>th</sup> Street, SW – Suite TW-A325  
Washington, D.C. 20554

**RE: EB Docket No. 06-36 CPNI Certification for  
Saturn Telecommunications Services Inc. d/b/a STS Telecom**

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Public Notice of January 29, 2008, and pursuant to 47 C.F.R. § 64.2009(e), Saturn Telecommunications Services Inc. d/b/a STS Telecom hereby files its Certification of Customer Proprietary Network information (CPNI) for the year 2007 and supporting Statement. As directed by the Public Notice, please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3031 or sthomas@tminc.com if you have any questions about this filing.

Sincerely,

Sharon Thomas  
Consultant to  
Saturn Telecommunications Services Inc.  
d/b/a STS Telecom

*ST/im.*  
*Enclosure*

Copy: Enforcement Bureau (*provided via ECFS website*)

Best Copy and Printing (*FCC@BCPIWEB.COM*)

TMS: FCX0801  
File: Saturn – FCC Certs / Orders

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for Calendar Year: 2007

Name of company covered by this certification: Saturn Telecommunication Services Inc.  
d/b/a STS Telecom

Form 499 Filer ID: 815129

Name of signatory: Keith Kramer

Title of signatory: Executive Vice President – Legal and  
Regulatory

I, Keith Kramer, certify and state that:

1. I am the Executive Vice President – Legal and Regulatory of Saturn Telecommunication Services Inc. d/b/a STS Telecom and, acting as an agent of the company, I have personal knowledge of Saturn Telecommunication Services Inc. d/b/a STS Telecom's operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, Saturn Telecommunication Services Inc. d/b/a STS Telecom's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

  
\_\_\_\_\_  
Keith Kramer, Executive Vice President – Legal and Regulatory

Feb. 18, 2008  
\_\_\_\_\_  
Date

**Exhibit A**  
**Statement of CPNI Procedures and Compliance**

## **Saturn Telecommunications Services Inc. d/b/a STS Telecom**

### **Statement of CPNI Procedures and Compliance**

Saturn Telecommunications Services Inc. d/b/a STS Telecom (“Saturn” or “the Company”) does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005. If Saturn elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

The Company trains its employees as to when they are and are not authorized to use CPNI. Employees receive this training during their new employee initiation and in annual refresher training. Saturn has a strict disciplinary process in place for the unauthorized use or improper disclosure of CPNI, which includes suspension or immediate dismissal of employees who violate the Company policy.

Saturn maintains a record of all sales and marketing campaigns that use CPNI. All outgoing marketing campaigns are reviewed and must be approved by the Company’s internal Regulatory Affairs Executive who is knowledgeable regarding CPNI requirements, prior to initiation of the campaign. The Company also maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

Saturn has processes in place to safeguard its customers’ CPNI from improper use or disclosure by employees and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. The Company has a strict policy prohibiting the disclosure of CPNI to any third parties, unless required to do so by the law (e.g., in response to a subpoena).

The Company has instituted authentication procedures to safeguard the disclosure of call detail over the telephone. Customers are authenticated by the Company’s account manager or agent at the time of service initiation, when the customer’s identify is readily authenticated. At that time, at the customer’s request, a password is issued, which does not rely upon readily available biographical information or account information. Saturn has also established back-up authentication procedures for lost or forgotten passwords that utilize pass code questions that do not rely upon readily available biographical information or account information.

If the appropriate password is not provided, Saturn does not disclose call detail over the telephone in response to a customer initiated inquiry, unless the customer can provide the call detail information that is the subject of the inquiry without the assistance of a customer service representative.

Saturn has instituted authentication procedures to safeguard the disclosure of CPNI on-line. These procedures do not require the use of readily available biographical information or account information as defined by the FCC. The company authenticates customers at the time of service initiation when the customer establishes a password for online access. Passwords do not rely on readily available biographical information or account information. Unless the appropriate password is provided, Saturn does not allow on-line access to CPNI. If a customer loses or forgets their password, the customer's identity is re-authenticated without the use of readily available biographical information or account information.

Saturn immediately notifies customers whenever a password, online account, or address of record is created or changed without revealing the changed information or sending the notification to the new account information.

Saturn does not have any retail locations and therefore does not disclose CPNI in-store.

Saturn has put in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. While the Company has not had any breaches to report, it has a process in place to maintain records of all breaches discovered and notifications made to the USSS and the FBI, and to customers.

The Company has not taken any actions against data brokers in the last year.

Saturn did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2007.

To date, the Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI. However, all employees undergo training to recognize pretexters' methods, as outlined by the FCC. STS utilizes its quality assurance call monitoring as one method of detecting potential pretexting.